

1 RICHARD A. WRIGHT, ESQ.
2 WRIGHT STANISH & WINCKLER
3 Nevada Bar No. 0886
4 300 South Fourth Street Ste. 701
5 Las Vegas, NV 89101
6 Attorneys for DEFENDANT

7 UNITED STATES DISTRICT COURT
8 DISTRICT OF NEVADA

9
10 UNITED STATES OF AMERICA,

11 Plaintiff,

12 vs.

13 RAMON DESAGE,

Defendant.

CASE NO. 2:13-cr-00039-JAD-VCF

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16 **EMERGENCY UNOPPOSED**
17 **MOTION FOR MODIFICATION OF CONDITIONS OF RELEASE**
18 **ALLOWING TRAVEL**

19 DEFENDANT RAMONE DESAGE, by and through his counsel, Richard A.
20 Wright, Esq., moves this Honorable Court to modify the conditions of his release as to
21 allow Defendant Ramone Desage to travel to Hurricane, Utah to return his son on
22 December 26, 27 or 28, 2013.

23 Mr. Desage's 12-year old son, Patrick, resides in a youth residential treatment
24 center, Diamond Ranch Academy, in Hurricane, Utah. Patrick arrived in Las Vegas on
25 December 20, 2013 to spend Christmas with Mr. Desage and his sisters. Mr. Desage
26 wants to drive Patrick back to Diamond Ranch Academy on December 26, 27 or 28,
27 2013.

1 Pretrial Services officer Jamie Stroup is in agreement with this request and will
2 require an itinerary and schedule beforehand. AUSA Gregory Damm is not opposed to
3 granting Mr. Desage this travel request.

4 DATED: December 23, 2013

5 WRIGHT STANISH & WINCKLER

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7 RICHARD A. WRIGHT, ESQ.
8 300 South Fourth Street Ste 701
9 Las Vegas, Nevada 89101
10 Counsel for Defendant
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1 CERTIFICATE OF DELIVERY

2 I HEREBY CERTIFY that on December 23, 2013, I caused a copy of the
3 foregoing EMERGENCY MOTION FOR MODIFICATION OF CONDITIONS OF
4 PRETRIAL RELEASE to be EMAILED and/or mailed to the following persons:
5

6 AUSA GREGORY DAMM
7 333 Las Vegas Blvd. South
8 Fifth Floor
9 Las Vegas, NV 89101

10 Pretrial Services Office
11 333 Las Vegas Blvd. South
12 First Floor
13 Las Vegas, NV 89101

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BY Debra K. Carosell
An employee of Wright Stanish & Winckler

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4 UNITED STATES DISTRICT COURT
5 DISTRICT OF NEVADA
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ORDER

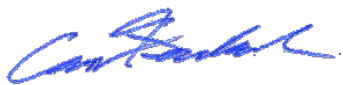
11 Before the court is Defendant's Motion for Modification of Conditions of Release
12 which is unopposed by the US Attorney and pretrial services.

13 The Defendant seeks permission to travel to Utah for the purpose of returning
14 his son after his visit to Las Vegas.

15 Having reviewed and considered the matter,

16 **IT IS ORDERED** that the Defendant's Motion for Modification of Conditions of
17 Release is hereby GRANTED. Defendant Desage shall be allowed to travel to Utah to
18 return his son home on December 26, 27 or 28, 2013, under the conditions deemed
19 appropriate by pretrial services.

20 DATED: December 23 2013

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22 Cam Ferenbach, Magistrate Judge
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